

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**In Re: JOHNNIE SANFORD and  
SHIRE SANFORD**

**CHAPTER 13  
NO: 13-12628 JDW**

**RESPONSE TO OBJECTION TO CONFIRMATION OF THE PLAN**

COMES NOW, JOHNNIE SANFORD and SHIRE SANFORD, Debtors in the above styled and numbered cause, by and through undersigned counsel, and file this their Response to Objection to Confirmation of the Plan (Dk #48), said Objection having been filed by AmeriCredit Financial Services, Inc. ("AmeriCredit"), respectfully showing unto the Court as follows:

1. The allegations of paragraph one of the Objection are admitted.
2. The allegations of paragraph two of the Objection are admitted.
3. The allegations of paragraph three of the Objection are admitted.
4. The allegations of paragraph four of the Objection are admitted.
5. The allegations of paragraph five of the Objection are admitted.
6. The allegations of paragraph six of the Objection are admitted.
7. The allegations of paragraph seven of the Objection are admitted.
8. The allegations of paragraph eight of the Objection are admitted.
9. The allegations of paragraph nine of the Objection are admitted.
10. Debtor admits that the full claim should be paid as a 910 claim together with interest at the rate of 5.5% per annum, and Debtor is willing to amend the plan to make said payment unless

an Order can be entered that provides for payment in the proper amount without the necessity of filing an amendment.

WHEREFORE, Debtors pray this Court will enter its Order overruling the Objection to Confirmation of 13 Plan filed by AmeriCredit and further granting relief consistent with this Response. Debtors pray for such other, further and general relief to which they may be entitled.

Respectfully Submitted,  
JOHNNIE SANFORD and  
SHIRE SANFORD, Debtors

By: /s/ Robert Gambrell  
ROBERT GAMBRELL; Attorney for Debtors

CERTIFICATE OF SERVICE

I, ROBERT GAMBRELL, Attorney for the above listed Debtors, do hereby certify that the following have been served electronically via ECF the above Response to Objection to Confirmation of Plan:

Henry G. Hobbs, Jr., Acting U. S. Trustee: USTPRegion05.JA.ECF@usdoj.gov  
Locke D. Barkley: sbeasley@barkley13.com  
Gregory J. Walsh: greg@sundmakerfirm.com

Served on this the 16<sup>th</sup> day of October, 2013.

/s/ Robert Gambrell  
ROBERT GAMBRELL; Attorney for  
Debtors; MSB #4409  
GAMBRELL & ASSOCIATES, PLLC  
101 Ricky D. Britt Blvd., Ste. 3  
Oxford, MS 38655  
Ph: (662)281-8800 / Fax: (662)202-1004  
rg@ms-bankruptcy.com